

Message

From: Donovan, Betsy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=1075D24015DB49549A456BC334BD9C25-DONOVAN, BETSY]
Sent: 4/1/2019 1:18:32 PM
To: Vaughn, Stephanie [Vaughn.Stephanie@epa.gov]; Kaur, Supinderjit [Kaur.Supinderjit@epa.gov]
CC: LaPoma, Jennifer [LaPoma.Jennifer@epa.gov]
Subject: FW: Rolling Knolls - revised draft FS Report

Here's Mike C's FS comments.

From: Clemetson, Michael
Sent: Wednesday, August 22, 2018 3:21 PM
To: Donovan, Betsy <Donovan.Betsy@epa.gov>
Cc: Kaur, Supinderjit <Kaur.Supinderjit@epa.gov>; Pensak, Mindy <Pensak.Mindy@epa.gov>; Jackson, Amelia <Jackson.Amelia@epa.gov>
Subject: RE: Rolling Knolls - revised draft FS Report

Hi Betsy,

The comments are acceptable. Yes, I agree with you about Figure 6-2!

Thanks,

Mike

From: Donovan, Betsy
Sent: Friday, August 17, 2018 11:51 AM
To: Clemetson, Michael <Clemetson.Michael@epa.gov>
Cc: Kaur, Supinderjit <Kaur.Supinderjit@epa.gov>
Subject: FW: Rolling Knolls - revised draft FS Report

Hi Mike, We have been reviewing the FS RTCs and wanted to know if Geosyntec's responses to comments 11, 41, 42, 43 and 44 are okay. 11 is a CDM comment (below) and we weren't sure that the response actually addressed the comment by simply replacing "environmentally sensitive" with "a wilderness area as defined by...." I just went back to read that section of the FS and it appears okay in the context of that section. It is a true statement. 41-44 (also below) were your comments on Appendix C and since you recently reviewed Appendix C, could you confirm that the responses below are okay? On a separate note – They did an excellent job of updating figure 6-2 with the blue spotted salamander siting! Thank you for your assistance! Have a great weekend.

11	36	5.1	2nd paragraph	The text says, "Another consideration in the identification of general response actions is that 35 acres of the landfill are located within an environmentally sensitive area within the GSNWR." However, based on Figure D4-1 of the Final BERA, the majority of the 35 acres of landfill within GSNWR was low-value upland or wetland.	The sentence has been revised as follows:" Another consideration in the identification of general response actions is that 35 acres of the landfill are located within a wilderness area as defined by the Wilderness Act within the GSNWR."
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				A very small area was identified as potential Bog Turtle Habitat Area (Figure 6-1). Please define the meaning of "environmentally sensitive area" and show these environmentally sensitive areas on a figure referenced in Section 5.	
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41	Appendix C		The discussion of the soil and soil invertebrate sampling that are within the 25- acre "Selected Area" indicates where the tabular data can be found. It may be useful to include further information regarding the soil invertebrates and the uncertainty associated with assuming that their concentrations are equal to the reporting limits.	A modified approach for assessing the ecological risks in the residual ecological risk assessment (rERA) was discussed with USEPA after these comments were provided. The revised rERA now includes an evaluation of alternative imputed values for non-detect results to address the uncertainty in the imputed values on the HQ _{LOAEL} results.
42	Appendix C		The evaluation of the American robin hazard quotients for cadmium, cyanide and selenium should include a discussion of reference hazard quotients for consistency with the other contaminants. Additionally, for the short-tailed shrew, information regarding reference hazard quotients should be included for cadmium and selenium.	A modified approach for assessing the ecological risks in the rERA was discussed with USEPA after these comments were provided. Any COPECs with HQ _{LOAEL} values greater than one are discussed in the revised rERA technical memorandum.
43	Appendix C		The hazard quotient associated with methylmercury risk to the American robin was calculated to be greater than one. Further information regarding the methylmercury toxicity reference values that are available may be helpful.	A modified approach for assessing the ecological risks in the rERA was discussed with USEPA after these comments were provided. This included use of a 10% methylmercury for measured total mercury content in soil invertebrates and alternate plant uptake factor based on methylmercury. All of the methylmercury HQ _{LOAEL} values are less than one. These data are presented in the revised rERA technical memorandum.
44	Appendix C		The discussion of the short-tailed shrew hazard quotient values includes information regarding cadmium, chromium, lead, and	A modified approach for assessing the ecological risks in the rERA was discussed with USEPA after these comments were provided. Any COPECs with HQ _{LOAEL}

		selenium. However, it is unclear why barium and PCDD/F were not included in this discussion.	values greater than one are discussed in the revised rERA technical memorandum.
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From: Donovan, Betsy

Sent: Tuesday, July 31, 2018 4:49 PM

To: Griffiths, Rachel <griffiths.rachel@epa.gov>; Sivak, Michael <Sivak.Michael@epa.gov>; Fajardo, Juan <Fajardo.Juan@epa.gov>; Vaughn, Stephanie <Vaughn.Stephanie@epa.gov>; Clemetson, Michael <Clemetson.Michael@epa.gov>; Jill McKenzie (Jill.McKenzie@dep.nj.gov) <Jill.McKenzie@dep.nj.gov>

Subject: FW: Rolling Knolls - revised draft FS Report

Hi Rolling Knolls Project Team,

Please see the following email and attachments with FS revisions and responses to our comments. Please check to see if your comments were adequately addressed and if the revisions are acceptable. We are working towards getting the Proposed Plan issued soon, so we would like to finalize the FS ASAP. If at all possible, **please let me know if the revisions and responses are okay no later than August 10th.**

Thanks and please contact me with any questions. - Betsy

From: John Persico [<mailto:JPersico@Geosyntec.com>]

Sent: Tuesday, July 31, 2018 3:54 PM

To: Donovan, Betsy <Donovan.Betsy@epa.gov>; Kaur, Supinderjit <Kaur.Supinderjit@epa.gov>; Vaughn, Stephanie <Vaughn.Stephanie@epa.gov>

Cc: Seth Kellogg <SKellogg@Geosyntec.com>; Julia Ryan <Julia.Ryan@Geosyntec.com>; McKenzie, Jill <Jill.McKenzie@dep.nj.gov>; Richard Ricci <r Ricci@lowenstein.com>; Gabala, Allison <AGabala@lowenstein.com>; mfaigen@issuessllc.com; Gary M. Fisher (gary.fisher@nokia.com) <gary.fisher@nokia.com>; alalonde@riker.com; Truedinger, Robb <robb.truedinger@novartis.com>; Michael Draikiwicz <mdraikiwicz@enviro-sciences.com>; Goldfarb, Steven <steven.goldfarb@novartis.com>; Irvin M. Freilich <IFreilich@gibbonslaw.com>; Shawn LaTourette <SLaTourette@gibbonslaw.com>; Mirza-Reid, Sofina <sofina.mirza-reid@novartis.com>; Brian Bergeron <pete.bergeron@chevron.com>; Richard T. Hughes <rhughes@jw.com>; George Molnar <George_Molnar@fws.gov>

Subject: Rolling Knolls - revised draft FS Report

Betsy, Supinder, and Stephanie - the revised draft Feasibility Study Report for Rolling Knolls is attached for your review. This email includes:

- The revised text, with changes in red-line/strike-out;
- Revised Figure 1-2 (shows lay down area);
- Revised Figure 6-2 (shows the location where the blue-spotted salamander was observed);
- Revised Tables 6-1 and 7-1 (show the new scoring where all scores are in words, not numbers); and
- Responses to USEPA and NJDEP comments.

Please let me know if you have any questions.

John L. Persico, P.G.*

Principal

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engineers | scientists | innovators